

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**MARGARET LEVINGS, and
JAMES LEVINGS,**

Plaintiffs,

V.

**DIMONT & ASSOCIATES, LLC and
JP MORGAN CHASE BANK, NA,**

Defendants.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

Case no. 21-cv-021-PRW

**MARGARET LEVINGS and JAMES LEVINGS' Motion to Enlarge Time to Respond to
DIMONT & ASSOCIATES, LLC.'s Motion to Dismiss to February 26, 2021**

Come now the Plaintiffs, MARGARET LEVINGS and JAMES LEVINGS, by and through undersigned counsel and request, with consent of counsel for Defendants, JPMORGAN CHASE BANK, N.A. and DIMONT & ASSOCIATES, LLC., to the granting of this motion, that this Court extend the time allowed for Plaintiffs to respond to Defendant DIMONT & ASSOCIATES, LLC's February 1, 2021 Motion to Dismiss for ten days until February 26, 2021 and states:

1. Plaintiffs were served with Defendant's Motion to Dismiss and due to illness of undersigned counsel, the demands of other legal matters and the current snow and ice and utility failure conditions, counsel for Plaintiffs is not able to file a response to Defendant's motion within the allotted time and therefore requests a short extension of time to respond to Defendant's Motion to Dismiss to February 26, 2021.

2. Undersigned counsel certifies that she has conferred via telephone regarding this Motion to extend time for Plaintiffs' response in opposition to Defendant's Motions to Dismiss

for ten days until February 26, 2021 and counsel for both Defendants advise that they have no objection and consent to the granting of this motion.

3. Plaintiffs respectfully request the Court's consideration of this Motion pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local District Court Rule 7, and request the Court exercise its discretion for the cause shown and extend the time for Plaintiffs to respond to Defendant's motion for the short time requested.

4. Plaintiffs are acting diligently to respond to the pending motion to dismiss and there is no prejudice or harm to the Defendants by affording the Levings an additional ten days to prepare and file their response so that their interests will be preserved by the granting of this motion.

Accordingly, Plaintiffs hereby respectfully request a ten-day enlargement of time to file a response and brief in opposition to Defendant's motion to dismiss.

DATED this 16th day of February, 2021.

Respectfully submitted,

s/Janet Roloff
Janet D. Roloff, OBA #6564
Attorney for MARGARET and JAMES LEVINGS.
Legal Aid Services of Oklahoma, Inc.
321 S. 3rd Street, Suite 6
McAlester OK 74501
Telephone 918.423.2030
Fax 918.423.2036
janet.roloff@laok.org

CERTIFICATE OF SERVICE

ATTORNEY FOR DEFENDANT
JPMORGAN CHASE BANK, N.A.:

BRENT J. RODINE
QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
brodine@qslwm.com

Attorneys for Defendant
Dimont & Associates, LLC:

Justin D. Meek
DEWITT PARUOLO MEEK, PLLC
P.O. Box 138800
Oklahoma City, OK 73113

- and -

Andrew M. Gould
Molly M. Jones
WICK PHILLIPS GOULD & MARTIN, LLP
3131 McKinney Avenue, Suite 100
Dallas, TX 75204